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Attorneys for Defendant
OCWEN LOAN SERVICING, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JEFFREY KUNS, an individual, on
his own behalf and on behalf of all
others similarly situated,

Plaintiff,

v.

OCWEN LOAN SERVICING, LLC,
a Delaware limited liability
company, and DOES 1-100,
inclusive,

Defendants.

Case No. CV-127118 DMG (PLAx)

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT BY NOT MORE
THAN 30 DAYS (L.R. 8-3)**

Complaint served: July 19, 2012
Current response due: August 24, 2012
New response date: September 19, 2012

WHEREAS, plaintiff Jeffrey Kuns filed the above-entitled action in
the Superior Court of the State of California, County of Los Angeles on July 17,
2012, which named Ocwen Loan Servicing LLC ("Ocwen") as a defendant; and

WHEREAS, Ocwen was served with the complaint on July 19, 2012;
and

WHEREAS, Ocwen removed this action to this Court on August 17,
2012, thus making its deadline to respond August 24, 2012; and

STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT

1 **WHEREAS**, Local Rule 8-3 provides that the parties may extend the
2 time to respond to the initial complaint by 30 days without Court approval;

3 **IT IS HEREBY STIPULATED** by and between plaintiff, on the one
4 hand, and defendant Ocwen on the other, through their respective counsel of record
5 herein, that Ocwen may have an extension of time to answer, move, or otherwise
6 respond to the plaintiff's complaint to and including September 19, 2012.

7
8 **IT IS SO STIPULATED.**

9 Dated: August 20, 2012

ELIZABETH L. MCKEEN
DANIELLE N. OAKLEY
EDGAR H. MARTINEZ
O'MELVENY & MYERS LLP

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14 By: /s/ Edgar H. Martinez

Edgar H. Martinez
Attorneys for Defendant
Ocwen Loan Servicing, LLC

15
16 Dated: August 20, 2012

JONATHAN COTHRAN
J. COTHRAN LAW OFFICES

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20 By: /s/ Jonathan Cothran

Jonathan Cothran
Attorney for Plaintiff Jeffrey Kuns

1 Filer's Attestation: In compliance with General Order 45(X)(B), I hereby
2 attest that concurrence in the filing of this document has been obtained from
3 Jonathan Cothran.

4 Dated: August 20, 2012

5 ELIZABETH L. MCKEEN
6 DANIELLE N. OAKLEY
7 EDGAR H. MARTINEZ
8 O'MELVENY & MYERS LLP

9 By: /s/ Edgar H. Martinez
10 Edgar H. Martinez
11 Attorneys for Defendant
12 Ocwen Loan Servicing, LLC
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PROOF OF SERVICE

I, Cristina Pappas, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 610 Newport Center Drive, 17th Floor, Newport Beach, California 92660-6429. On August 20, 2012, I served the within documents:

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)

☐ by transmitting via facsimile machine the document(s) listed above to the fax number(s) set forth below on this date at approximately _____ .m. The outgoing facsimile machine telephone number in this office is (949) 823-6994. The facsimile machines used in this office create a transmission report for each outgoing facsimile transmitted. A copy of the transmission report(s) for the service of this document, properly issued by the facsimile machine(s) that transmitted this document and showing that such transmission was (transmissions were) completed without error, is attached hereto.

☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Newport Beach, California addressed as set forth below. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☐ by putting a true and correct copy thereof, together with a signed copy of this declaration, in a sealed envelope designated by the carrier, with delivery fees paid or provided for, for delivery the next business day to the person(s) listed below, and placing the envelope for collection today by the overnight courier in accordance with the firm's ordinary business practices. I am readily familiar with this firm's practice for collection and processing of overnight courier correspondence. In the ordinary course of business, such correspondence collected from me would be processed on the same day, with fees thereon fully prepaid, and deposited that day in a box or other facility regularly maintained by FedEx, which is an express carrier.

☐ by putting a true and correct copy thereof, together with a signed copy of this declaration, in a sealed envelope, with Express Mail postage fully prepaid to the person(s) listed below, and placing the envelope for collection and mailing today with the United States Postal Service as an Express Mail item in accordance with the firm's ordinary business practices. I am readily familiar with this firm's practice for collection and processing of Express Mail correspondence for mailing with the United States Postal Service. In the ordinary course of business, Express Mail correspondence collected from me would be processed on the same day, with Express Mail postage thereon fully prepaid, and placed for deposit that day with the United States Postal Service by depositing it that same day in a post office, mailbox, subpost office, substation, mail chute, or other like facility regularly maintained by the United States Postal Service for receipt of Express Mail.



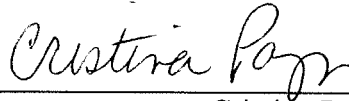
2 by causing the document(s) to be emailed or electronically transmitted to the
3 person(s) at the email addresses set forth below, pursuant to a court order or an
4 agreement of the parties to accept service by email or electronic transmission. I
5 did not receive, within a reasonable time after the transmission, any electronic
6 message or other indication that the transmission was unsuccessful.

7 Jonathan Cothran, Esq.
8 jpcothranlaw@gmail.com
9 J. COTHRAN LAW OFFICES
10 **2230 West Chapman Avenue, Suite 200**
11 Orange, CA 92868
12 Tel: (714) 974-5600
13 Fax: (888) 958-3028

14 Attorneys for Plaintiff Jeffrey Kuns, on his
15 own behalf, and on behalf of all others
16 similarly situated

17 I declare under penalty of perjury under the laws of the State of California that the
18 above is true and correct.

19 Executed on August 20, 2012, at Newport Beach, California.

20 

21 Cristina Pappas

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